



THE ASSOCIATION FOR
**DRESSINGS
& SAUCES**

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August 15, 2005

Mr. Arthur Neal
Director, Program Administration
National Organic Program
USDA-AMS-TMP-NOP
1400 Independence Avenue SW
Room 4008-So.
Ag Stop 0268
Washington, DC 20250

Fax: (202) 205-7808

RE: National Organic Program, Sunset Review
Docket Number TM-04-07

Dear Mr. Neal:

The Association for Dressings and Sauces (ADS) is the international trade association representing manufacturers of salad dressings, mayonnaise and condiment sauces and the suppliers to the industry. ADS submits the following comments on the advance notice of proposed rulemaking published in the June 17, 2005 *Federal Register* (70 FR 35177) related to the National Organic Program Sunset Review. In the notice, the United States Department of Agriculture's (USDA) Agricultural Marketing Service (AMS) is requesting comments on certain synthetic and non-synthetic substances on the National List of Allowed and Prohibited Substances for organic agricultural production and handling.

There are a number of synthetic and non-synthetic substances included on the National List that are used in the production of organic dressing and sauce products. ADS supports the continued use of the synthetic and non-synthetic substances included in §205.605, "Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as "organic" or "made with organic (specified ingredients or food groups(s))" and §205.606, "Nonorganically produced agricultural products allowed as ingredients in or on processed products labeled as "organic" or "made with organic (specified ingredients or food group(s))." These substances are important elements of existing organic products, which meet consumer expectations.

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Maintaining these ingredients on the National List provides access to a variety of ingredients to encourage product innovation to meet consumer demand in this growing food segment. For example, gums are used to impart a particular texture and mouthfeel to dressing and sauce products, including modified products. In addition, gums provide emulsion stability for dressings and serve as stabilizers in sauces. The use of these gums, as well as other ingredients on the National List, provides manufacturers with options to produce a wide variety of organic dressing and sauce products, thereby offering consumers choices of such products to meet their particular lifestyle preferences, such as optimal weight maintenance.

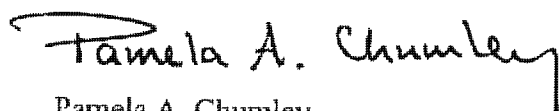
Specifically, ADS is requesting that the following substances in §205.605(a) and (b), continue to be allowed in the manufacture of organic products:

- (a) Non-synthetic substances allowed: acids (citric and lactic), calcium carbonate, calcium chloride, dairy cultures, flavors, nitrogen, potassium chloride, sodium bicarbonate and sodium carbonate.
- (b) Synthetic substances allowed: alginates, calcium hydroxide, chlorine materials, hydrogen peroxide, lecithin (bleached), ozone, phosphoric acid, potassium carbonate, tocopherols and xanthan gum.

In addition, ADS is requesting that cornstarch (native), gums (arabic, locust bean, carob bean), kelp and lecithin (unbleached) continue to be included on the National List (§205.606) as these substances are used by the dressing and sauce industry.

We appreciate your consideration of these comments.

Sincerely,



Pamela A. Chumley
Executive Director